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*Counsel for Defendant Google LLC*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, *et al.*, individually and  
on behalf of themselves and all others  
similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JOSEPH H.  
MARGOLIES IN SUPPORT OF  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL THE  
SECOND SUPPLEMENTAL REPORT OF  
JONATHAN HOCHMAN (DKT. 990)**

Judge: Hon. Yvonne Gonzalez Rogers

1 I, Joseph H. Margolies, declare as follows:

2 1. I am an attorney with Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for  
3 Defendant Google LLC (“Google”) in this action. I am making this declaration pursuant to Civil  
4 Local Rule 79-5(e)–(f) as an attorney for Google as the Designating Party, pursuant to Civil Local  
5 Rule 79-5(f)(3) in response to Dkt. 990.

6 2. On September 8, 2023, Plaintiffs filed their Administrative Motion to File Under  
7 Seal the Second Supplemental Report of Johnathan Hochman (Dkt. 990), pursuant to the Court’s  
8 September 7, 2023 Order (Dkt. 988). On September 8, 2023, I received unredacted service copies  
9 of the document sought to be sealed.

10 3. I have reviewed the documents that Plaintiffs seek to file under seal pursuant to Civil  
11 Local Rule 79-5(f). Based on my review, there are compelling reasons to seal the following:

Document(s) to be Sealed	Basis for Sealing
<p>12 Second Supplemental Expert 13 Report of Jonathan E. Hochman 14 Pages 2-19 15 Google joins Plaintiffs’ motion to 16 seal in PART with respect to this 17 document.</p>	<p>The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including Google’s logs and internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.</p>

24 4. Google’s request is narrowly tailored in order to protect its confidential information.  
25 These redactions are limited in scope and volume. Because the proposed redactions are narrowly  
26 tailored and limited to portions containing Google’s highly confidential or confidential information,  
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1 Google requests that the portions of the aforementioned documents be redacted from any public  
2 version of those documents.

3 5. Google does not seek to redact or file under seal any portions of Plaintiffs' Expert  
4 Report not indicated in the table above.

5 I declare under penalty of perjury of the laws of the United States that the foregoing is true  
6 and correct. Executed in Bayside, Wisconsin on September 15, 2023.

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9 By /s/ Joseph H. Margolies  
Joseph H. Margolies  
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